

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Mary T. Thomas, *et al.*,

Plaintiffs,

v.

Marci Andino, *et al.*,

Defendants.

No.: 3:20-cv-01552-JMC

**Election Defendants’
Motion for Summary Judgment**

Defendants Marci Andino, John Wells, JoAnne Day, Clifford J. Edler, Linda McCall, and Scott Moseley, pursuant to Federal Rule of Civil Procedure 56, move for summary judgment on all six of the Plaintiffs’ claims.

The Plaintiffs challenge two provisions of South Carolina’s absentee voting laws: the Qualification Requirement and the Witness Requirement. First, they bring claims under the United States Constitution, Voting Rights Act (“VRA”), and Americans with Disabilities Act (“ADA”) seeking to enjoin the requirement that all South Carolinians must meet a statutory qualification to vote by absentee ballot. *See* S.C. Code § 7-15-320. Second, they bring those same three claims attempting to enjoin the requirement that a voter’s oath on an absentee mail ballot must be witnessed. *See* S.C. Code § 7-15-380.

The Plaintiffs do not even have standing to assert their challenges to the Qualification Requirement. On the merits, their challenges to both provisions lack merit.

This motion is supported by the attached memorandum and exhibits, pursuant to Local Civil Rule 7.04.

Respectfully Submitted,

s/ Wm. Grayson Lambert

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